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ABSTRACT

The General Accounting Office (GAO) undertook a review of management improvements to determine the effectiveness of advanced education programs for Department of Defense civilian employees. This was similar to an earlier GAO report on administering graduate education programs for military officers. In this report, GAO reviewed the long-term, full-time training carried out by the Departments of the Army, Navy, and Air Force. Long-term, full-time training is the formal schooling to which a civilian employee is assigned on a full-time basis for 120 days or more. This schooling includes academic programs offered by private, state, and federal institutions. The courses are usually at the graduate level in management, scientific, engineering, or technical fields. The results indicated that management's approach does not ensure that the program objectives are being met as effectively as possible. Specifically, there are inadequacies in the (1) planning of training programs, (2) selection of participating schools and employees, (3) evaluations of training programs, and (4) administration of training funds. (Author/JS)

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REPORT TO THE CONGRESS

GAO
AC

Opportunities To Increase Effectiveness Of Long-Term, Full-Time Training Program For Civilian Employees B-70896

Department of Defense

BY THE COMPTROLLER GENERAL OF THE UNITED STATES

JUNE 30, 1972

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-70896

To the President of the Senate and the
Speaker of the House of Representatives

This is our report on the opportunities to increase the effectiveness of the long-term, full-time training programs for civilian employees in the Department of Defense.

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of this report are being sent to the Director, Office of Management and Budget; the Secretary of Defense; the Secretaries of the Army, Navy, and Air Force; and the Chairman, United States Civil Service Commission.

Elmer B. Staats

Comptroller General
of the United States

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ABBREVIATIONS

CSC	Civil Service Commission
DOD	Department of Defense
GAO	General Accounting Office
GETA	Government Employees Training Act

COMPTROLLER GENERAL'S REPORT TO THE CONGRESS

OPPORTUNITIES TO INCREASE EFFECTIVENESS OF LONG-TERM, FULL-TIME TRAINING PROGRAM FOR CIVILIAN EMPLOYEES
Department of Defense B-70896

D I G E S T

WHY THE REVIEW WAS MADE

In a previous report the General Accounting Office (GAO) identified improvements needed in administering graduate education programs for military officers. To determine whether similar management improvements could increase the effectiveness of advanced education programs for civilian employees of the Department of Defense (DOD), GAO has reviewed the long-term, full-time training carried out by the Departments of the Army, Navy, and Air Force.

What is long-term, full-time training?

It is formal schooling to which a civilian employee is assigned on a full-time basis for a period of 120 days or more. It includes academic programs offered by private or State universities or colleges and comparable Federal institutions, such as the National War College and the Industrial College of the Armed Forces. The courses are generally at the graduate level in management, scientific, engineering, or technical fields.

About $13 million was spent during fiscal year 1971 for 1,000 civilian employees who participated in this type of training in non-Government facilities. Comparable data for training in Government facilities were not readily available from DOD's records.

FINDINGS AND CONCLUSIONS

Management's approach does not ensure that the stated program objectives are being met as effectively as possible. This is due, primarily, to the failure of management to fully and effectively implement existing DOD and military department regulations and, secondarily, to the minor deficiencies of those regulations.

Planning of training programs

Serious inadequacies exist in the program-planning practices of local management in determining training needs, selecting participating employees and institutions, and using the employees' new skills.

Formal inventories of training needs are not being identified in a planned and systematic manner, contrary to regulations. Priorities for immediate and long-range training needs are not being assigned, and training is not being scheduled over a prescribed 5-year cycle. (See p. 7.)

Adequate planning for using an employee's training is not being accomplished. (See p. 7.)

Regulations provide local field activities with broad, general guidance for determining when long-term, full-time training is preferable to other, lower cost alternatives. Specific direction is needed to supplement these regulations. There is no requirement to document the alternatives considered and the reason for their rejection. (See p. 11.)

Some field activities are placing undue emphasis on Government-sponsored training for the sole purpose of the participant's obtaining an academic degree. (See p. 12.)

Selection of participating schools and employees

Employees selected for training are not necessarily in areas where the need for training is the greatest. (See p. 17.)

Insufficient attention has been given to the selection of non-Government schools which best meet the criteria set forth in regulations. (See p. 18.)

Evaluation of training programs

Evaluation and review at all management levels of training and education programs is inadequate for measuring realistically how well such programs are achieving their objectives.

Training program objectives are not clearly defined. It is difficult to properly assess whether goals are being met. (See p. 7.)

Regulations of the services, with the exception of those of the Army, do not provide specific guidance to field activities on how to meet DOD and Civil Service Commission (CSC) requirements on training evaluation. (See p. 22.)

Program review by audit and inspection teams has been inadequate and, when such reviews have been made, insufficient use has been made of the findings and recommendations. (See p. 23.)

Administration of training funds

Headquarters levels provide special hiring authorizations and funds to subordinate commands for staffing support during the employees' absences. The funds are meant to pay the trainee's salary and certain other costs while he is in school, with the specific intention that the funds thus freed will be used to hire a temporary replacement. This is not always being done. Instead, the money is being used (in some instances) for other, unrelated purposes. There is no control to ensure that these funds are used as intended. (See p. 29.)

RECOMMENDATIONS OR SUGGESTIONS

The military departments should amend current regulations to:

--Require that copies of summary planning documents be submitted with the training budget. (See p. 9.)

--Give more specific direction to local field activities for determining when long-term, full-time training should be used in lieu of after-hours, part-time, or short-term programs. (See p 14.)

--Reflect the requirement that training justifications state the alternatives considered and the reasons for their rejection. (See p. 14.)

--Require major commands to submit annual evaluations of the fiscal year training program reflecting the extent to which the planned training was accomplished. (See p. 28.)

The military departments should ensure that special hiring authorizations and funds provided for staffing support are used as intended. (See p. 32.)

Major commanders should ensure that (1) advance planning of training is improved (see p. 9) and (2) policy statements and practices of subordinate organization training officials reflect the objective of training to improve skills and abilities required in direct performance of official duties, rather than to attain academic degrees. (See p. 14.)

Major commanders and their representatives should assert a positive influence in selecting for training those employees assigned to areas where the need for training has been determined to be the greatest and most immediate and in designating the training facilities and courses of instruction which best meet those needs. (See p. 21.)

Major commanders should make more extensive use of internal review offices and Inspector General teams to audit compliance with training regulations and to report on how effectively training programs are carried out. (See p. 28.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

DOD generally agreed with GAO (see app. I) and stated that it would explore every opportunity to improve the training of civilian employees. However, GAO's recommendation that specific changes be made to DOD regulations pertaining to documentary support for training program planning decisions was not fully accepted. (See pp. 9 and 15.)

Although the proposed actions by DOD are directed toward implementing the report's recommendations, a vigorous followup will be necessary to ensure effective and timely accomplishment of these objectives.

CSC stated that the report should prove very useful to DOD, as well as to CSC, in improving the effectiveness of long-term, full-time training. CSC also advised GAO of several current projects which would provide to Federal agencies additional guidance relating to planning, evaluating, and selecting employees for training. (See app. II.)

MATTERS FOR CONSIDERATION BY THE CONGRESS

This report provides current information to those committees of the Congress concerned with DOD's management of training programs under the Government Employees Training Act.

CHAPTER 1

INTRODUCTION

Long-term, full-time training and education is that off-the-job schooling to which a civilian employee is assigned on a full-time basis for a period of 120 days or more without regard to whether such training is accomplished in non-Government or Government educational facilities. It includes the academic programs offered by private or State universities or colleges and comparable Federal institutions, such as the National War College and the Industrial College of the Armed Forces. The courses generally are at the graduate level and are in the management, scientific, engineering, or technical fields.

During fiscal year 1971 about 1,000 civilian employees of the Department of Defense (DOD) participated in long-term, full-time programs in non-Government facilities at a cost which the General Accounting Office (GAO) estimated to be approximately $13 million for salaries, travel, tuition, books, fees, and incidental expenses. Comparable data for training in Government training institutions are not readily available from DOD's records.

Under the Government Employees Training Act (GETA) of 1958 (5 U.S.C. 4101 et seq.), the Civil Service Commission (CSC) is charged with the responsibility, and is given the authority to prescribe regulations, for the administration of long-term, full-time training programs conducted by Federal agencies. These regulations are set forth in the CSC's Federal Personnel Manual.

DOD Directive 1430.4 delegates authority to administer training and education programs to the Secretaries of the military departments and directors of DOD agencies. Policies and standards for the conduct of training are prescribed in DOD Instruction 1430.5 which implements the broad objectives established in GETA. Each of the military departments has issued regulations which, in general, further delegate training responsibilities to headquarters and field activity officials and which provide guidance for planning, administering, and reporting employee training and developmental programs.

Training regulations of CSC, DOD, and the military departments make a clear distinction between the use of Government and non-Government training facilities. They require that the possibility of using Government training be carefully explored before non-Government training is approved. The regulations do not provide comparable definitive criteria for determining the conditions under which long-term, full-time training and education, rather than such alternatives as part-time, off-duty, or short training courses, should be used.

A large percentage of the training and educational needs of the civilian employees of DOD is met by training programs of relatively short duration and at nominal cost. DOD's objectives in supporting long-term, full-time training and education are to maintain a position of leadership in defense-oriented science and technology and to provide opportunities for career employees of promise to grow and realize their full potential, which would thereby enable them to successfully cope with the complex problems of managing all aspects of national defense activities.

CHAPTER 2

INADEQUACIES IN PROGRAM PLANNING

At the installations we visited, the required annual training plans which provide for long-term, full-time training were being prepared. However, these plans were not always supported by the required annual inventories of training needs, both immediate and long-range, which identify the specific local training requirements, assign relative priorities, and project the time frame within which the long-term, full-time training should be accomplished. These projections for meeting training needs should be based on a 5-year cycle: the ensuing fiscal year, plus the 4 following years.

CSC requires each agency to review its training needs annually. The review is to be conducted in a planned and systematic manner, and records are to be maintained showing the date of the review, procedures used, and findings and recommendations for subsequent use in planning and evaluating the training program.

Applicable DOD instructions provide that, at the time a decision is reached to assign an employee to long-term, full-time training, plans be formulated to make effective use of each individual employee's newly acquired skills and abilities after the training is completed. The instructions provide also that, upon the employee's return to duty from such training, these plans be carried out. The plans are to be in writing and to be monitored by higher headquarters to make sure that the objectives of the training are being achieved, including the assurance that the employee is placed in an assignment in which his training can be fully utilized.

Documented advance planning for the utilization of newly acquired skills and abilities of employees does not exist at some of the installations we visited and is inadequate at others. Without such prior planning for utilizing an individual's training, an accurate appraisal of the benefits of that training cannot readily be made. (See pp. 22 to 26.)

At one Army installation we were told that:

"*** a written inventory of training needs, per se, does not exist, nor is an annual inventory performed. The requirement to accomplish an inventory appears to be a management tool intended for use to prod into action those agencies unresponsive to the spirit of the GETA."

At the Navy installations we were told that a written annual inventory of training needs was not prepared because the Office of Civilian Manpower Management instruction relating to training did not require them.

At the Air Force installation we were told that 5-year training plans had originally been prepared some years ago as required but had not been consistently updated from that time.

CONCLUSIONS

Formal annual inventories of training needs were not being prepared at local levels in a planned and systematic manner, contrary to regulations, in order that specific training needs might be identified. Relative priorities for immediate and long-range training needs were not being assigned nor was the required training being scheduled over the prescribed 5-year cycle. As a result training plans submitted by field activities for long-term, full-time training and education represented not so much a realistic plan to fulfill the organization's immediate and long-range needs as they did a pragmatic accommodation between employees' applications and available funds. (See p. 18.)

Adequate advance planning for the utilization of training is not being done, contrary to regulations, and therefore there can be no assurance that the objectives of the training are being achieved. Recognizing the difficulties inherent in such long-range planning, we nevertheless believe that the importance of relating training to specific needs and providing some means by which the effectiveness of that training can be evaluated dictates that management try harder to comply with the requirements to formulate and carry out definite plans for assignment of employees upon completion of training.

RECOMMENDATIONS

We recommend that the Secretary of Defense direct major commanders to ensure that annual inventories of training needs are prepared, priorities are assigned to training needs, plans are made for utilization of training, and training is scheduled over a 5-year cycle. We recommend also that the Secretary of Defense direct appropriate headquarters activities to require that copies of summary planning documents be submitted with the training budget.

AGENCY COMMENTS AND GAO EVALUATION

In its comments (see app. I) on our report draft, DOD agreed with our first recommendation and stated that field activities needed to observe the provisions of existing regulations more closely as they relate to the planning of training programs. DOD will emphasize this need in an internal memorandum, and survey teams and other inspection groups will be requested to review the development and utilization of training plans.

DOD did not accept our recommendation to require that field activities provide parent commands with planning documentation at the time of submission of the training budget. In commenting on that recommendation, DOD stated that such documentation was voluminous and detailed and was intended for review by the local commander and/or training committees who were familiar with the specific mission of the organization and with the detailed work assignment of the individual involved.

Summaries of the supporting documentation for the activity's training plan mentioned in the proceeding recommendation--specifically, the annual inventory of training needs and the projected 5-year training schedules calculated to meet these needs on the basis of relative priorities--appear to be the minimum essential type of information needed by any higher level of command in its considerations of the merits of training budgets presented to it for review and endorsement.

Additional guidance for estimating costs for budgeting long-term, full-time training has been provided by DOD to the

military departments after our review was completed. Further, DOD promised to ensure that there is coordination with local budgetary officials in the preparation of future training plans. Although our recommendarions did not address these areas, we agree with the proposed actions by DOD.

We believe that the corrective action indicated in the DOD letter is generally responsive to the conditions cited in the report. However, as noted above, we believe that further consideration should be given to our recommendation requiring that summaries of planning documents accompany the training budget.

CHAPTER 3

FACTORS INFLUENCING APPROVAL OF LONG-TERM, FULL-TIME TRAINING

Installation records, in most instances, showed little evidence that alternative, lower cost training had been considered by officials before approving long-term, full-time training or that, when such alternatives had been considered, they were rejected for valid reasons.

One of the principal reasons advanced in support of the long-term, full-time training program by training officials, participants, and their supervisors was that comparable training often was not otherwise available locally. They assured us that, when similar training was available locally, the alternatives of part-time, off-duty, or short courses were given consideration. Other reasons advanced by them for the selection of long-term, full-time training were:

--Field assignments of indefinite length prevented employees' taking after-hours courses.

--Employees could not do justice to both their jobs and their studies.

--Short programs would not provide the continuity needed to master the technology required.

--Part-time or off-duty training would not provide the needed training early enough to meet requirements.

Any one or a combination of the above considerations might, in individually considered cases, provide a justification for selecting long-term, full-time training instead of other, lower cost training where valid training requirements exist. However, some of the additional reasons which were given to us--i.e., an individual's desire to complete work toward a degree as soon as possible and the difficulty in obtaining required courses for a degree on a part-time basis--appeared to have contravened the intent of GETA and pertinent regulations.

EMPHASIS ON OBTAINING ACADEMIC DEGREES

GETA expressly prohibits assignment of an employee to training at a non-Government facility or payment of the costs of training solely for the purpose of providing opportunity to such employee to obtain one or more academic degrees. According to CSC regulations this prohibition should not, however:

> "*** be construed by agencies as limiting their authority to assign employees to training in non-Government facilities when the training is for the purpose of developing those skills, abilities and knowledges which will best qualify them for performance of official duties. If in the accomplishment of this training an employee receives an academic degree, this may be considered as merely an incidental by-product of the training."

Regulations of DOD and the military departments repeat this prohibition. Yet at one Army installation we found that considerable emphasis had been placed on obtaining academic degrees. Several supervisors and some employees told us that there had been a "push" on degrees and also unofficial indications that advanced degrees would be required for promotions above grade GS-13. On training applications submitted to the installation's training committee for fiscal year 1972, the applicant was required to show the degree sought and the degree requirements, such as residency and examinations. We were told that this was the first time the formal application had requested this information but that the same information had been elicited previously in an informal manner during interviews with training participants.

At this same Army installation a standing operating procedure reads, in part:

> "PURPOSE. To establish policy, assign responsibilities, and prescribe procedures for the selection and nomination of employees for graduate training leading to a Ph.D. degree; to assure optimum distribution of Ph.D. degree personnel within the directorate."

We found it significant that, of the 18 training participants we interviewed at this installation, 16 had received advanced degrees or had completed all course requirements for degrees through Government-sponsored long-term, full-time training programs.

At another Army installation, we found that the long-term, full-time program had been directed primarily toward obtaining advanced degrees. The need for a scientific education program, including both part-time and full-time training, was stated in a policy planning document prepared in 1967. In essence, the statement of local policy encouraged the subordinate activities to fully utilize the long-term, full-time training program to obtain advanced degrees for their employees. The planning document specified the number of people needed to be active in advanced study in order for the program to produce the necessary number of holders of master's and doctor's degrees.

At a Navy installation, a local instruction seemingly has opened the door for employees' taking courses paid for by the Government solely to meet degree requirements. This instruction states that courses must be job oriented before they can be taken under the long-term, full-time training program. If, however, a speech course is needed for a degree and a degree is needed for the job, then a speech course is considered a job-oriented course.

Most of the courses taken by the 20 employees whom we interviewed at this installation did appear to have been job oriented, although five employees had taken courses which might appear questionable--Spanish, English composition, college algebra, and thesis preparation. Eight of the participants we interviewed either completed or finished a large part of their thesis or dissertation requirements while on long-term, full-time training programs. One employee had participated in the program for 1 year and 8 months working solely on his dissertation. We recognize, however, that, under certain circumstances, employees' taking courses such as those cited above and thesis preparation may be appropriate. (See pp. 40 and 41.)

CONCLUSIONS

In our opinion the broad general guidance given local field activities by regulations prescribing those situations under which long-term, full-time training and education is preferable to other, lower cost alternatives is inadequate and should be supplemented with some specific direction. We believe that it would be beneficial to the approving authority if training justifications submitted in conjunction with nominations for long-term, full-time training were required to state what alternatives had been considered and the reasons for their rejection.

There are indications that some field activities are placing undue emphasis on Government-sponsored training for the sole purpose of the participant's obtaining an academic degree. Although an advanced degree is tangible evidence of achievement that can provide additional incentive to motivate the employee to self-development efforts and that may benefit the organization indirectly, as in the case of the prestige value of such professional recognition, the primary objective of training must always be the improvement of skills and abilities required in the direct performance of current or anticipated assigned responsibilities.

RECOMMENDATIONS

We recommend that the Secretary of Defense direct that (1) military departments amend current regulations to give more specific direction to local field activities for determining when long-term, full-time training should be used in lieu of after-hours, part-time, or short-term programs and to include the requirement that training justifications state the alternatives considered and the reasons for their rejections and (2) major commanders ensure that policy statements and practices of subordinate organization training officials reflect the objective of training to improve skills and abilities required in direct performance of official duties rather than to attain academic degrees.

AGENCY COMMENTS AND GAO EVALUATION

In its comments DOD appears to agree with our belief that some record should be made a part of the training justification reflecting alternatives considered for selected part-time, after-hours, or short-term programs. The DOD letter states, in part, that:

> "It is considered to be *** appropriate and within the bounds of sound management principles to maintain records on the alternatives considered and justification of the choice of [the type of] training ***."

Yet there is some objection by DOD to annotate the record with the reasons for rejecting the other alternatives. There is an apparent inconsistency between these two positions. We believe that decisions regarding the selected mode of training vitally affect the overall costs and effectiveness of the program and that the alternatives considered and the reasons given for their rejection therefore should be a visible part of the records available for review by approving officers and inspection teams and external organizations such as CSC and GAO.

DOD has advised us that the Office of the Assistant Secretary of Defense (Manpower and Reserve Affairs) will work with the military departments in an effort to assist them in the development of general criteria by which individual determinations of appropriate modes of training can be made and records can be maintained. We concur in this action provided that the broad, general guidance already incorporated in current regulations of the departments will be supplemented by more specific direction which will not be equally subject to such liberal interpretation by local field activities.

DOD did not comment on our suggestion that the attainment of academic degrees as an objective be deemphasized by requiring that local policy statements and practices be limited to reflecting the provisions of regulations to provide for the necessary training and education in skills and abilities required in the performance of present and anticipated assigned responsibilities. We believe that this

action is required to foster a proper attitude toward this training by participants and others, which is important to the achievement of a successful program.

Since the DOD reply was not specific on actions to be taken regarding our first recommendation and did not comment on the second, we reserve any further opinion as to the effectiveness of the measures to improve upon the conditions noted until such time as we have reexamined, during our continuing review of Government employee training programs, the matters involved.

CHAPTER 4

SELECTION OF TRAINING PROGRAM PARTICIPANTS AND ACADEMIC INSTITUTIONS

Written criteria for selection of employees for long-term, full-time training and education were either non-existent or stated in such broad generalities at installations we visited that the selection of almost any employee for assignment to long-term, full-time education programs could be justified. In addition, the personal preferences of individuals selected for training played a major role in the selection of academic institutions at which they received such training.

SELECTION OF TRAINEES

DOD and military department regulations generally provide for establishing selection procedures to recognize the needs of all employees and provide for fair and equitable treatment consistent with the accepted practices of good personnel management. Approval authority for training in non-Government facilities has been delegated to local field activity commanders. At all levels there is a requirement for written statements of training policy which provide for the expression of broad policies set forth in the authorizing regulations but which also incorporate the more specific considerations governing the application of these broad policies to the local training program.

Installation commanders have training committees or advisory panels whose responsibilities include recommending for training those employees who would best fulfill the training needs of the organization. However, at many activities the actual practice of those charged with the selection of long-term, full-time trainees appears to have been to give rubber-stamp approval to the application initiated by the employee who is interested in furthering his personal career objectives. We observed, in many instances, that the employee not only applied for a particular type of training but also selected the courses to be taken and the school

to be attended. Records we examined showed that the employee himself frequently prepared the formal justification for the training.

This type of selection procedure is all too often in response to the annual request by the activity for long-term, full-time training nominations before its training needs have been documented, priorities have been established, and the results have been incorporated into a comprehensive long-range training plan. The role of the supervisor, department head, and training committee then becomes that of routine approval, subject mainly to budgetary constraints or obvious lack of qualifications of applicants. This appears to be an abdication of responsibility by the various levels of management that are supposed to identify the areas in the specific work environment which would lend themselves to improvement through added training which directly contributes to the achievement of the mission of the organization.

An example of the failure to gear approvals of long-range, full-time training to demonstrable needs related to the organization's specific requirements is the case of a program analyst who was transferred from one major Army command activity to another as a result of a reduction in force. Graduate study had been approved for the employee by the losing command prior to his transfer, and this approval was continued without question by the gaining organization.

The employee's current supervisor told us that the employee was in the office about 60 days before departing for his training. The supervisor felt that this was hardly long enough for him to know whether the employee needed training. The supervisor had not seen the justification for training nor did he know what courses the employee was taking. The supervisor said he was hopeful that the training would be of benefit in the assignment he had planned for the employee upon his return. Additional in-house training would be required, however, to fully prepare the employee for the duties of the planned assignment, according to the supervisor.

SELECTION OF TRAINING FACILITIES

Various officials interviewed stated that the trainee played a major role in selecting the academic institution for

the long-term, full-time education program but that consideration was also given to curriculum, cost, location, acceptance by the institution, and credit hours already obtained on a part-time basis. Generally, we were told, the original choice of schools was the trainee's; however, the activities may suggest an alternative facility which offers a better choice of study, faculty, or geographic location. As a matter of practice, we found that the trainee's personal choice was seldom overruled.

The Federal Personnel Manual requires that, before an employee may be trained in a non-Government facility, the agency must determine that no adequate or reasonably available facility exists within the Government. It gives as the principal criterion for selection of a non-Government facility the ability to meet the agency's training needs effectively, economically, and timely. When there is a choice among facilities, consideration should be given to such factors as relative competency to provide the needed training, geographic accessibility of the facility, comparative costs, accreditation, and practicality of administrative arrangements.

DOD, military department, and local implementing regulations generally reiterate the above requirements and criteria and the prohibitions and limitation prescribed by GETA for training through non-Government facilities. Some implementing regulations require that a statement be included in the nomination for training, when applicable, that the training is not available through Government facilities.

Officials whom we interviewed said that, if the needed training was available to civilians through Government facilities, these facilities were used. Some advantages of sending employees to Government schools, we were told, included better scheduling, unique programs tailored to specific service needs, and low tuition cost. These advantages are more often offset, however, by such factors as limited curriculum, length of program, and limitations on civilian enrollment. Therefore most training--scientific and technical types--of the management is provided through non-Government academic institutions.

We also asked employees why they had selected the schools that they attended. Some employees stated that the courses were not available locally or that they considered the selected institutions to have the best program in their specific fields. A number of participants said that they had selected institutions which they had previously attended either because they were familiar with the staff or because they already had credits established in a graduate program.

One Army employee, who had been assigned twice to long-term, full-time education programs, said he had selected the first school because he had credits toward a master's degree and wanted to finish the requirements. He selected the second school because he wanted a Ph.D. degree from "a top school." He was able to complete all of his course work for the degree during his second assignment.

At a Navy installation one trainee selected a certain school because he had done his undergraduate work there and because his family lived in the same town. Another employee selected a certain university because the school lowered its graduate admissions standards in order to accept him.

COMPLIANCE WITH WAIVER PROVISIONS FOR LIMITATIONS ON TRAINING THROUGH NON-GOVERNMENT FACILITIES

There are two restrictions on selection of employees for training through non-Government facilities. Employees selected for training must have a minimum of 1 year of continuous civilian service prior to their assignments, and the maximum training period cannot exceed 1 year (2 years for scientific and engineering personnel) during each 10-year period of continuous service. These limitations may be waived, however, when postponement of the training is determined to be contrary to the public interest.

We found that these restrictions on the selection of trainees had not placed any undue burden on the activities we visited. Where necessary, the required waiver had been secured. Generally we found that the proper procedures had been complied with in the securing of waivers, although there were a few instances in which documentation appeared to be of questionable acceptability.

CONCLUSIONS

Management has not adequately discharged its responsibility for selecting for training those employees whose assignments are in the previously identified areas where the need for additional training is the greatest. Insufficient attention has been given by management to the selection of non-Government schools which best meet the criteria set forth in the pertinent regulations. The absence of proper exercise of these responsibilities by management has, in many instances, resulted in employees' nominating themselves for training, selecting the schools to be attended, and choosing the courses to be taken. It appeared that some abuses of the program had occurred as a result of such practices, with the objectives of the organization being subordinated to the personal career goals of the individual employee.

RECOMMENDATION

We recommend that the Secretary of Defense direct that major commanders and their representatives assert more positive influences in selecting for training those employees assigned to areas where the need is greatest and most immediate and in designating the training facilities and courses of instruction which best meet those needs.

AGENCY COMMENTS AND GAO EVALUATION

In commenting on our report draft, DOD stated that action would be taken to require the military departments to reexamine the guidance provided to major commanders to ensure that the suggested improvements in the selection of employees, courses, and facilities for long-term, full-time training and education are effected.

We believe that the corrective action indicated in the DOD reply, if followed through vigorously, can be effective in reducing future abuses of the program similar to those illustrated in this report.

CHAPTER 5

EVALUATION OF LONG-TERM, FULL-TIME TRAINING

The successive delegations of training responsibilities from departmental levels to commands and field activities, authorized by DOD and service regulations, have contributed to inadequate management control and evaluation of the long-term, full-time training program at the service levels.

The military departments do not require any training evaluation reports to headquarters by the major commands or local installations, although we found evidence that reviews of training were being made at various levels. Statistical-type data are reported to the Office of the Secretary of Defense for consolidation and transmission, annually, to the Civil Service Commission. Navy and Air Force regulations do not require local installations to make formal evaluation studies of training activities at regular intervals; Army regulations require such studies. As a result, there is need for improvement in the formal mechanism whereby the services can:

1. Assess the extent to which this program is achieving its intended objectives.

2. Guide efforts to increase the values and benefits of the program.

3. Ensure that training resources are being utilized economically and effectively.

4. Determine needs, establish priorities, allocate resources, and plan for future long-term, full-time training.

Some of the indications of shortcomings in evaluation aspects of the long-term, full-time training program, noted in our examination of records during visits to installations, follow.

The Department of the Army Headquarters has made three evaluation studies of long-term, full-time training. The latest study, based on responses to questionnaires by

selected employees participating in the program in fiscal years 1968-69, concluded that there was room for improvement in the following areas: (1) determining training requirements, (2) selecting employees for training, (3) supporting the trainees, and (4) capitalizing on the investment in training.

The study recommended that each installation (1) strive for continuous improvement in local administration of the program, particularly in relation to planning (mission and employee careers), selection, and support of trainees and (2) evaluate its own effectiveness in administering the long-term, full-time training and education program in the light of the findings of the study.

At one Army installation we were told that no formal written evaluation of the long-term, full-time education program had ever been completed. Periodic, informal reviews had been made but only to show the comparison between the actual number of people in the program as opposed to the number of employees required to be in training, as specified by a policy statement issued locally in 1967, in order for the program to produce the necessary number of advanced-degree holders.

The only regular evaluation of the long-term, full-time education being done at another Army installation was to send a questionnaire to the employee and his supervisor shortly after the training had been completed. The employee was required to rate the training received as good, fair, or poor in terms of material presented, facilities, and value to his organization. The supervisor commented on the degree of benefits received, influence of the training on the employee's performance, suggestions for improving the training program, and whether he would recommend the training for others. Training officials said that this was a one-time evaluation and that they knew of no other local evaluation activities.

Local internal review and Inspector General reports prepared at two Army installations, based on examinations performed during 1970, were critical of the lack of available evidence that the long-term, full-time training taken

was related to the employee's field of work or was to enhance his effectiveness.

At one naval installation we were told that the Navy's Office of Civilian Manpower Management did perform an evaluation study of long-term, full-time training in 1967. However, the local installation did not receive any feedback on the results of the study as to areas where improvements could be made in administering the program. Local training officials stated that evaluations of the program had only been done on an individual and informal basis by various organizations at that site. At the time of our review, the Navy had under development a Training Requirements and Information Management System which was expected to provide data needed to plan for, obtain, and develop the civilian work force needed to meet the mission needs of all Navy commands.

The Air Force Systems Command made an evaluation study of its long-term, full-time training and education program in 1969. It was based on responses to a questionnaire mailed to a random sample of 100 former participants in training during 1966-68, to supervisors of the participants, and to 100 nonparticipants and their supervisors. The study cited three shortcomings in the program.

1. Limitations on the opportunities to participate.

2. Ineffective selection and procedures.

3. Too little advance planning for effective utilization of training received.

While examining various installations' training files, we noted a number of instances where there was no evidence of courses completed or grades received and where there was a lack of documentation to identify courses being taken by current participants. In several cases the records showed only that the training involved research for thesis requirements for advanced degrees. Certainly this lack of adequate recordkeeping could not contribute to a proper evaluation of training.

At each installation we interviewed a number of the former trainees and their supervisors to determine how they

evaluated the extent to which the training was being utilized consistent with the intent of previously determined training needs. Most of those interviewed felt that the training was being used in current assignments. Those who felt that the training was not being adequately utilized attributed that fact to reduction-in-force actions and resulting reorganizations which prevented the employees' being assigned as anticipated and to budgetary restraints on proposed projects. Some supervisors stated that, without the training received, the employees would not have been able to hold their current positions, although others said that the former trainees were generally more capable or that, even though no noticeable improvement had been observed in the employees' work, it was believed that they had acquired more knowledge in the technical area in which they were working as a result of the training.

We were told by some participants and supervisors that the purpose of the training was being attained because, in their view, the training objective was merely to provide an upgrading of educational or technical backgrounds (credentials). This subjective criterion must be considered in any assessment of the value or benefits received from such training expressed by trainees or their supervisors. This criterion is not, however, the stated program objective under GETA.

PROGRAM EVALUATION BY THE CIVIL SERVICE COMMISSION

During the period in which our review was made, CSC launched a Government-wide study of the effectiveness of long-term, full-time training. The Departments of the Army, Navy, and Air Force were included among those Government agencies required to participate in this study.

Each agency participating was requested to report on its analysis of agency resources committed to long-term, full-time training through non-Government facilities during the 10-year period--fiscal years 1960-69--with a general measuring of the resultant benefit to the sponsor. The report on the study is to contain:

1. A summary of the findings resulting from the agency's self-evaluation.

2. A statement of the agency's policy, reflecting its current views as to the role long-term, full-time training through non-Government facilities will play in meeting future needs.

3. Any recommendations the agency may care to make concerning Government-wide policy and regulations governing long-term training through non-Government facilities.

The studies by the DOD components had not started when our review was completed.

CONCLUSIONS

The evaluation and review of long-term, full-time training and education programs at all levels within DOD, we believe, is inadequate to allow proper measurement of the extent to which such programs are achieving their intended objectives and obtaining maximum value and benefits from the substantial investment of resources. This inadequacy stems from (1) deficiencies in the program planning previously discussed, which make an assessment of the degree of accomplishment of program goals extremely difficult, (2) lack of specific guidance in some implementing regulations, and (3) failure of higher headquarters to adequately monitor the

planning, execution, and review of the programs administered by field activities.

The inadequacies in the area of determination of training needs, selection of trainees and training facilities, and planned utilization of training have resulted in training plans which were of questionable validity. It follows that, if program objectives are not clearly expressed, there cannot be a proper evaluation made of the degree of achievement of these objectives.

The Department of the Army is the only service which now provides any specific guidance in its regulations implementing CSC and DOD requirements as to the methods the field activities should use in evaluating the results of training. Recognizing that only minimal requirements are set forth by the Army, we believe that at least some type of similar guidance should be provided by the other services.

We believe that the annual, primarily statistical, report required of the field activities for consolidation and transmission to CSC, in accordance with GETA, does not by itself constitute an effective monitoring of the planning, execution, and review of local long-term, full-time training and education programs. A more effective evaluation of local programs could be achieved by higher headquarters if the field activities were required to (1) submit copies of their annual inventory of training needs and their plans for utilization of training, when completed, at the time they submit their yearly training plan (budget) and (2) submit copies of annual evaluations at the end of the fiscal year training program, which reflect the extent to which the program plan was accomplished.

We believe further that program reviews by local and higher headquarters audit and inspection teams have been inadequate and that, when such reviews have been made, insufficient use has been made of the findings and recommendations. This valuable management tool, used more consistently and effectively, should add a needed measure of control.

RECOMMENDATIONS

We recommend that the Secretary of Defense direct that (1) military departments amend current regulations to require major commands to submit annual evaluations of the fiscal year training program reflecting the extent to which the planned training was accomplished and (2) major command and higher headquarters make more extensive use of internal review offices and Inspector General teams to audit compliance with training regulations and report on the effectiveness with which training programs are being carried out.

AGENCY COMMENTS AND GAO EVALUATION

DOD's comments on our report draft stated that the Office of the Secretary of Defense, in cooperation with the military departments, would develop DOD-wide criteria for evaluation of the effectiveness of training. The annual report of training made by the military departments to CSC, required by GETA, will also be examined by the Office of the Secretary of Defense to determine the degree to which it may be utilized for the evaluation of long-term training. As recommended in our report, DOD will require the military departments to incorporate the evaluation of long-term, full-time training programs as a special item of coverage in the personnel management surveys conducted by internal review organizations.

We believe that the agreement by DOD to reexamine its present policy and the indications of other appropriate actions, where required, are responsive to the conditions cited in this report.

CHAPTER 6

IMPROVEMENTS NEEDED IN MANAGING DEPARTMENTAL SPECIAL CENTRAL POOLS OF TRAINING FUNDS AND PERSONNEL AUTHORIZATIONS

The military departments have not developed procedures for monitoring the use of those special manpower spaces and funds made available to subordinate commands from central pools at the headquarters levels that are adequate for ensuring that these manpower spaces and funds are used for the intended purpose of supporting long-term, full-time training. In a number of instances, such funds were used to support other types of local activities and were not returned to the department level for reprograming.

Costs of salary, travel and per diem, tuition, books, and other related expenses incurred by an installation as a result of assigning an employee to long-term, full-time education and training can be appreciable. In addition, provision must normally be made for the staffing support necessary to achieve organizational objectives during the absence of the employee for such training. Consequently there can be an understandable reluctance on the part of an installation or activity to make maximum use of training opportunities when the organization's budget is curtailed.

To overcome this problem, the Deputy Secretary of Defense in 1964 directed the military departments to establish, each fiscal year, a special pool of manpower spaces and funds to support projected requirements for long-term education and training requirements to meet identified needs for development of technical and management skills. Governing regulations provide that administration of these departmental central pools of manpower spaces and programed funds, specifically earmarked for long-term education and training, be monitored at the Secretary level of the service concerned. Allocations of spaces and funds from the central pool are to be made to major commands for administration at that level only when a specific plan for their use has been approved in advance by the Secretary of the military department.

The central pool funds are provided to pay the trainee's salary and certain other costs, with the specific intention that the organizational funds normally designated for his salary will be used to hire a temporary replacement. The funds supplied for salary should be returned to the central pool if a replacement is not hired. Under this arrangement, spaces and funds for long-term, full-time education and training can be more efficiently utilized and organizations operating at lower levels will not be forced to divert current resources furnished for direct support of their missions to meet longer range training requirements of this nature.

At one Army installation we found that, for fiscal year 1970, $137,500 was allotted from central pool funds, including $80,422 for the salaries of trainees. Although the installation had proposed hiring replacements for the six employees assigned to long-term, full-time training, no replacements were actually hired. However, no refund of the salary funds was ever made to the central pool, contrary to requirements.

For the 5-year period (fiscal years 1966-70) considered in our review, the Army central pool had provided to this installation $595,812 and 31 manpower spaces to support 53 long-term, full-time trainees. Local officials told us that information on the number of trainee replacements actually hired in relation to the spaces provided was not readily available and that a special review would have to be made at each organization receiving spaces in order to obtain the figures. There was no evidence that the Army had monitored the use of these funds to ensure that they were actually being effectively used to support the long-term, full-time training program.

Another Army installation had participated in the long-term, full-time training program in only 3 of the 5 years considered in our review. During this time central pool funds of $420,200 and 18 spaces had been authorized the installation to support 30 participants in that program. Our discussion with officials and examination of records disclosed only two cases in which persons hired by the installation may have actually qualified, on the basis of job assignments, as replacements for the trainees. Yet we found no

evidence that any of the special funds had been returned to the central pool.

At two Navy installations about $989,000 had been supplied by central pool funds to support the long-term education and training program from 1968. Of this amount, about $837,000 was applied to salaries and benefits. However, the information we were supplied by the activities indicated that they were not hiring temporary replacements for participants in the long-term, full-time training program. Most of the supervisors interviewed by us stated that, usually, the remaining employees in the respective branches absorbed the workload of the trainees during their absences. In certain cases, temporary promotions or internal transfers had been made to adjust to the situation.

These practices are not consistent with the policy of central pool support set out in directives of the Navy's Office of Civilian Manpower Management. Those directives state that funds for salary and benefits will be reserved for instances where there is reasonable assurance that a temporary replacement will be employed in connection with a long-term training assignment. We were not able to determine, however, that the Navy had made any effort to recover any of the central pool funds in order to employ them more effectively at other installations.

At an Air Force installation, about $1.2 million had been requested from central pool funds in the past 3 years by the three largest activities and a major portion of these funds was for the salaries of trainees. We found that, in most instances, replacements were not hired for those individuals who were absent from their jobs to take such training. Even though manpower spaces in excess of normal ceilings had been authorized by the central pool to permit such hiring, the funds provided were apparently applied to other local programs. Because the major command did not specifically designate long-term, full-time training funds within total training allocations and because of the apparent flexibility with which the subordinate commands were allowed to shift funds to support various programs, we were unable to determine how these central pool funds were actually used.

CONCLUSIONS

We believe that supplemental funding supplied by the military departments to field activities in support of long-term, full-time training and education programs frequently is not being used for the purposes intended. When funds are provided to pay the salary of the trainee while absent from his job, it is with the specific intention that the organization's funds thus freed will be used to hire a temporary replacement. If a replacement is not hired, the funds supplied for salary should be returned to the central pool of funds to be available to some other organization. This is not always being done. Instead, the funds apparently are being used in some instances for other, unrelated purposes.

We believe further that the headquarters offices of the military departments that are charged with administering these central pool funds are not making an adequate effort to monitor the use of these resources. There appear to be no provisions for controls to ensure that these funds are actually being used in support of training.

The conversion of the special training funds to other purposes and the failure of higher headquarters to detect and correct the situation, could adversely affect the accomplishment of training program objectives.

RECOMMENDATION

We recommend that the Secretary of Defense direct the military departments to institute adequate controls over the use of central pool funds to ensure that maximum benefit is being attained for the furtherance of training objectives.

AGENCY COMMENTS AND GAO EVALUATION

In commenting on our report draft, DOD stated that action would be taken to have the controls exercised by military departments over the use of central pool funds and personnel authorizations reexamined to ensure the efficient and effective use of resources.

Since the DOD reply was not specific as to what ultimate form that corrective action would take, we reserve any opinion as to the effectiveness of the measures to improve upon the conditions noted in this report until such time as we have had an opportunity to reexamine the utilization of those resources.

CHAPTER 7

SCOPE OF REVIEW

In performing our review, covering 5 fiscal years 1966-70, we examined appropriate sections of the Federal Personnel Manual and DOD military department and installation regulations and instructions. In addition, we examined annual training reports, personnel files, and related records for that period. We also interviewed a representative sample of those employees who participated in the program during those years and their supervisors.

We discussed our findings with those local officials responsible for the management of the civilian training programs. Our review was directed primarily toward the administration and operation of the program at the installation level.

The following installation were chosen because of the concentration of professional staff in the management, scientific, engineering, and technical fields typically represented at this type (research and development) activity, and these are the fields in which long-term, full-time training is generally given.

Army

Frankford Arsenal, Philadelphia, Pennsylvania
U.S. Army Missile Command, Redstone Arsenal, Alabama
Aberdeen Proving Ground, Aberdeen, Maryland
Aberdeen Research and Development Center, Aberdeen, Maryland

Navy

Naval Ship Research and Development Center, Carderock, Maryland
Naval Oceanographic Office, Suitland, Maryland

Air Force

Aeronautical Systems Division, Air Force Systems Command, Wright-Patterson Air Force Base, Ohio

APPENDIX I

ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, D. C. 20301

MANPOWER AND
RESERVE AFFAIRS

10 MAR 1972

Mr. Forrest R. Browne
Associate Director
Defense Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Browne:

The Secretary of Defense has asked me to reply to your letter of January 11, 1972, transmitting the report on "Opportunities to Increase Program Effectiveness of Long-Term, Full-Time Training of Civilian Employees (Department of Defense) (Code 84230) (OSD Case #3399)."

The Department of Defense is in substantial agreement with the recommendations contained in the report. The areas in which we are not in full accord are covered in the attachment containing comments on each of the GAO recommendations.

The Department of Defense shares your interest in this most important area of employee development and will explore every opportunity to increase the effectiveness of long-term, full-time training of civilian employees of the Department of Defense.

Sincerely,

Robert C. Taber
Lieutenant General, U. S. Army
Principal Deputy

Attachment

APPENDIX I

Opportunities to Increase Program Effectiveness of Long-Term, Full-Time Training of Civilian Employees (DoD) (Code 84230) (OSD Case #3399)

GAO RECOMMENDATION

"...that the Secretary of Defense direct major commanders to ensure that annual inventories of training needs are being prepared, priorities are assigned to training needs, plans are made for utilization of training, and training is scheduled over a five-year cycle." (See page 5 of the report).

DOD COMMENT

Department of Defense Instruction 1430.5, Subject: "Civilian Employee Training Policies and Standards," holds managers at all levels responsible for (a) the identification of training needs of individual employees, and (b) an annual inventory of training needs. In developing an inventory of needs, it is required that priorities, in accordance with criteria contained in DoD Instruction 1430.5, of needs and projections for accomplishments be developed concurrently. DoD policy also requires training need projections to be based on a five-year cycle or force structure.

The need to more closely observe the provisions of DoD Instruction 1430.5 will be emphasized in an ASD(M&RA) memorandum and survey teams and other appropriate inspection groups will be requested to review the development and utilization of training plans.

GAO RECOMMENDATION

"...that the Secretary of Defense direct appropriate headquarters activities to require that copies of planning documents be submitted with the training budget." (See page 5 of the report).

DOD COMMENT

Budgetary procedures for long-term training should be consistent with total DoD budget activities and procedures. The wisdom of incorporating additional or special procedures, other than those specified in DoD Instruction 1430.5, is questioned at this time. It is believed that compliance with the following policy quoted should suffice: "Training plans must be realistic, adequately justified, and coordinated with local budgetary officials if plans are to compete equitably with other programs for funding." DoD components have been provided with guidelines

for classifying estimated costs for this purpose since completion of the GAO review of long-term, full-time training of DoD civilians. Planning documents associated with long-term training requests, in most instances, are quite voluminous and detailed and are intended for review by the local commander and/or training committees who are familiar with the specific mission of the organization and detailed work assignment of the individual involved. Accordingly, it is not considered that a requirement for submission of a multitude of training plans with the budget is feasible.

Action will be taken to insure that there is coordination with local budgetary officials in the preparation of all training plans.

GAO RECOMMENDATION

"...that the Secretary of Defense direct that (1) military departments amend current regulations to give more specific direction to local field activities for determining when long-term, full-time training should be used in lieu of after-hours, part-time, or short-term programs and to reflect the requirement that training justifications state the alternatives considered and reasons for their rejections, and (2) major commanders ensure that policy statements and practices of training officials reflect the objective of training to improve skills and abilities required in direct performance of assigned responsibilities rather than the attaining of academic degrees." (See page 10 of the report).

DOD COMMENT

The recommendation is considered to have merit. However, we question the advisability of maintaining records of reasons for rejection of certain modes of training. It is considered to be more appropriate and within the bounds of sound management principles to maintain records on the alternatives considered and justification of the choice of training rather than to maintain records on rejections.

Without minimizing the difficulty of providing local field activities with specific directions for determining appropriate modes of training, this office will work with the military departments in an effort to assist them in the development of general criteria by which such individual determinations can be made and records maintained.

APPENDIX I

GAO RECOMMENDATION

"...that the Secretary of Defense direct that major commanders and their representatives assert a more positive influence in selecting for training those employees assigned to areas where the need is greatest and most immediate and in designating those training facilities and courses of instruction which best meet those needs." (See page 16 of the report).

DOD COMMENT

DoD components make use of career screening panels, selection panels, and functional chiefs in identifying high potential candidates for long-term training assignments consistent with needs irrespective of whether support for any such training is provided locally or centrally. The military departments will be asked to reexamine their guidance to assure that major commanders and their representatives assert a more positive influence in selecting for training those employees assigned to areas where the need is greatest and most immediate and in designating those training facilities and courses of instruction which best meet those needs.

GAO RECOMMENDATION

"...that the Secretary of Defense direct that (1) military departments amend current regulations to require major commands to submit annual evaluations of the fiscal year training program reflecting the extent to which the planned training was accomplished, and (2) major command and higher headquarters make more extensive use of internal review offices and Inspector-General teams to audit compliance with training regulations and report on the effectiveness with which training programs are being carried out." (See page 24 of the report).

DOD COMMENT

DoD policy requires each DoD component to establish procedures to assure that training provided employees is evaluated for its effectiveness in such manner and as often as necessary to provide data to meet the requirements of the Federal Personnel Manual (Chapter 410.3-5). The Office of the Secretary of Defense is working with the military departments to develop uniform DoD-wide criteria for obtaining evaluations. Present policy will be reexamined and action will be taken as found to be appropriate.

Action will be taken to require the military departments to incorporate the evaluation of long-term training programs as a special item of coverage in the personnel management surveys conducted by their internal review offices. The annual report of training, required by 5 USC Chapter 41, Section 4113, will also be examined to determine the degree to which it may be utilized by the military departments for the evaluation of long-term training.

GAO RECOMMENDATION

"...that the Secretary of Defense direct the military departments to institute adequate controls over use of central pool funds to assure that maximum benefit is being attained for the furtherance of training objectives." (See page 29 of the report).

DOD COMMENT

Action will be taken to request the military departments to reexamine existing controls over the use of central pool funds and personnel authorizations to assure efficient and effective use of resources.

APPENDIX II

UNITED STATES CIVIL SERVICE COMMISSION

WASHINGTON, D.C. 20415

IN REPLY PLEASE REFER TO

YOUR REFERENCE

28 FEB 1972

Mr. Henry Eschwege
Associate Director
Civil Division
U.S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege:

Thank you for the opportunity to review your proposed report, "Opportunities to Increase Program Effectiveness of Long-term, Full-time Training of Civilian Employees (Department of Defense)."

This report is particularly well done. It deals competently with the basic issues of long term training; a keen and perceptive analysis is made of the data. It should prove very useful to the Department of Defense, as well as to Civil Service Commission officials, in improving the effectiveness of the use of this particular type of training.

As a result of our review we have the following specific comments to make:

On page 9, the report seems to suggest that courses in Spanish, English Composition and College Algebra may be questionable. We are to infer from the context in which this statement occurs that GAO does not consider such courses sufficiently "job oriented." The Commission has taken the position that, under certain circumstances, such courses may be authorized under the training law -- see FPM Letter 410-9 (attached). We invite your attention to this. Although this Letter speaks especially to the needs of lower-level employees, the principles enunciated apply to higher-level employees as well.

Also on page 9 the report suggests that courses in thesis preparation may be questionable. It is our view that such expenses can be justified by an agency on the grounds that the employee acquires through that process a familiarity with a research methodology which would enhance his capabilities in the performance of official

duties after his return from the training assignment. This is especially true when research results relate closely to the agency mission.

On page 10, the report uses the term "assigned responsibilities" in a way that might be construed too narrowly if it is not qualified in some way. Presumably the term is meant to be synonymous with the term "official duties" used in defining the term training in the law (5 U.S. 4101). The Commission has issued a definition of "official duties" -- see FPM Letter 410-9. By means of that definition, the Commission made clear that employees can be given training which is relevant to projected future assignments as well as training relevant to present assigned responsibilities.

We would also like to acquaint you and your staff with several current projects in the Commission that would have some relationship to the findings and implementation of recommendations of the report.

1. The Commission's Bureau of Personnel Management Evaluation has been encouraging agencies to assure that internal evaluation systems respond to the entire subject of employee development. This Bureau is in the process of final editing of a new advisor's handbook which considers long-term, full-time training as an integral element of comprehensive employee development. This should tend to have an effect on selection, planning, and evaluation systems.

2. The Guidelines for Executive Development in the Federal Service, FPM Letter 412-1 (attached), suggest a planning schedule based on individual development plans and then aggregating the results of the individual plans to make up an agency-wide plan. While these guidelines are addressed only to high potentials for management development, this is often the group selected for long term training programs. In addition, it emphasizes the need for planning.

3. The Bureau of Training intends to offer additional guidance to agencies and individuals in the planning and use of the Education for Public Management program, CSC Bulletin 410-67 (attached), as well as other long term training opportunities.

APPENDIX II

Thank you again for the opportunity given the Civil Service Commission to review and comment on this report.

Sincerely yours,

Bernard Rosen
Executive Director

Attachments

APPENDIX III

PRINCIPAL OFFICIALS OF

THE DEPARTMENT OF DEFENSE, THE MILITARY DEPARTMENTS,

AND THE UNITED STATES CIVIL SERVICE COMMISSION

RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES

DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
DEPARTMENT OF DEFENSE		
SECRETARY OF DEFENSE:		
Melvin R. Laird	Jan. 1969	Present
Clark M. Clifford	Mar. 1968	Jan. 1969
Robert S. McNamara	Jan. 1961	Feb. 1968
ASSISTANT SECRETARY OF DEFENSE (MANPOWER AND RESERVE AFFAIRS):		
Roger T. Kelley	Mar. 1969	Present
Vice Admiral W. P. Mack (acting)	Feb. 1969	Mar. 1969
Alfred B. Fitt	Oct. 1967	Jan. 1969
Thomas D. Morris	Oct. 1965	Sept. 1967
DEPARTMENT OF THE AIR FORCE		
SECRETARY OF THE AIR FORCE:		
Dr. Robert C. Seamans, Jr.	Jan. 1969	Present
Dr. Harold Brown	Oct. 1965	Jan. 1969
ASSISTANT SECRETARY OF THE AIR FORCE (MANPOWER AND RESERVE AFFAIRS):		
Richard J. Borda	Oct. 1970	Present
James P. Goode (acting)	Apr. 1970	Oct. 1970
Dr. Curtis W. Tarr	June 1969	Apr. 1970
James P. Goode (acting)	Mar. 1969	June 1969

APPENDIX III

	Tenure of office	
	From	To
DEPARTMENT OF THE AIR FORCE (continued)		
ASSISTANT SECRETARY OF THE AIR FORCE (MANPOWER AND RESERVE AFFAIRS) (continued):		
J. William Doolittle	Apr. 1968	Mar. 1969
Dr. Eugene T. Ferraro (acting)	Jan. 1968	Mar. 1968
Dr. Eugene T. Ferraro (note a)	June 1966	Dec. 1967
DEPARTMENT OF THE ARMY		
SECRETARY OF THE ARMY:		
Robert F. Froehlke	July 1971	Present
Stanley R. Resor	July 1965	June 1971
ASSISTANT SECRETARY OF THE ARMY (MANPOWER AND RESERVE AFFAIRS):		
Hadlai A. Hull	May 1971	Present
Donald W. Srull (acting)	Dec. 1970	May 1971
William K. Brehn	Apr. 1968	Dec. 1970
Arthur W. Allen, Jr. (acting)	Jan. 1968	Apr. 1968
Arthur W. Allen, Jr. (note a)	Oct. 1963	Jan. 1968
DEPARTMENT OF THE NAVY		
SECRETARY OF THE NAVY:		
John W. Warner	May 1972	Present
John H. Chafee	Jan. 1969	May 1972
Paul R. Ignatius	Aug. 1967	Jan. 1969
John T. McNaughton	July 1967	July 1967
Paul H. Nitze	Nov. 1963	June 1967
ASSISTANT SECRETARY OF THE NAVY (MANPOWER AND RESERVE AFFAIRS):		
James E. Johnson	June 1971	Present
Robert H. Willey (acting)	Apr. 1971	June 1971
James D. Hittle	Feb. 1969	Mar. 1971
Randolph S. Driver (note a)	Aug. 1967	Feb. 1969

	Tenure of office	
	From	To
UNITED STATES CIVIL SERVICE COMMISSION		
CHAIRMAN:		
Robert E. Hampton	Jan. 1969	Present
John W. Macy, Jr.	Mar. 1961	Jan. 1969

[a]Performed corresponding duties as Deputy Under Secretary (Manpower) prior to creation of present office in January 1968.

Copies of this report are available from the U. S. General Accounting Office, Room 6417, 441 G Street, N W., Washington, D.C., 20548.

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